

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Esther Salas, U.S.D.J.
v. : Crim. No. 12-368
KASHIF ROBINSON : NOTICE OF JOINT MOTION FOR AN
ORDER GRANTING A CONTINUANCE

PLEASE TAKE NOTICE that the United States of America (Paul J. Fishman, United States Attorney, by James Donnelly, Assistant United States Attorney), and KASHIF ROBINSON, by Susan Cassell, Esq., jointly move for an order granting a second 60 day continuance of the proceedings in the above-captioned matter to permit defense counsel the reasonable time necessary for effective preparation in this matter and to allow the parties to conduct plea negotiations and attempt to finalize a plea agreement. In support of this application, the parties represent that:

1. The defendant is aware that the defendant has the right to have the matter brought to trial within 70 days of the date of his appearance before a judicial officer of this court pursuant to Title 18, United States Code, Section 3161(c)(1), and the defendant has consented to the continuance and waived such right.
2. Taking into account the exercise of diligence, the

facts of this case require that defense counsel be permitted a reasonable amount of additional time for effective preparation in this matter

3. Plea negotiations are currently in progress, and both the United States and the defendant desire additional time to negotiate a plea agreement, which would render trial of this matter unnecessary.
4. As a result of the foregoing, pursuant to Title 18, United States Code, Section 3161(h)(7), the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Respectfully submitted,


PAUL J. FISHMAN
United States Attorney



By James Donnelly
Assistant U.S. Attorney

August 24, 2012.

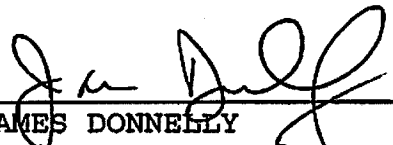
Consent as to Form and Substance of the Order:


Susan Cassell, Esq.

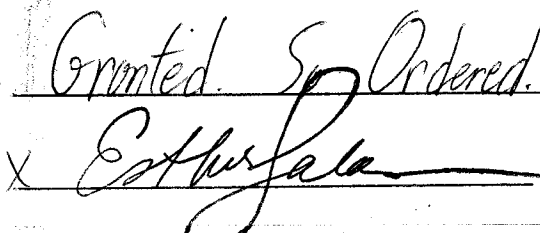
CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of this notice of motion to be served by electronic filing upon:

SUSAN CASSELL, Esq.
419 LUCILLE COURT
RIDGEWOOD, NJ 07450


JAMES DONNELLY
Assistant U.S. Attorney

419 LUCILLE COURT
RIDGEWOOD, NJ 07450


ESTHER SALAS, U.S.D.J.